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APR 30 2014
CLERK OF COURT
ALVIN K. HELLERSTEIN

April 30, 2014

BY FAX

Hon. Alvin K. Hellerstein
United States District Court
United States Courthouse
500 Pearl Street, Room 1050
New York, NY 10007

Re: Delta Pilots Association v. John Doe
Case No. 14-cv-225 (AKH)

Dear Judge Hellerstein:

On behalf of the Plaintiff, Delta Pilots Association ("DPA"), we write to request an adjournment of the Rule 16 conference scheduled for June 27, 2014. This is the first request to adjourn this conference.

DPA commenced this action on January 13, 2014, for declaratory judgment, injunctive relief, and monetary damages stemming from the "hacking" of Plaintiff's website in November 2013 by an unknown party or parties. On January 17, 2014, we filed a motion (Dkt. #3) seeking leave of the Court to serve immediate discovery on third-party Internet web-hosting or web-service companies, Internet Service Providers, telephone companies, and other third parties believed to be in possession of relevant information that would determine, or assist in determining, the identity of the "John Doe" defendant(s). The motion was granted on January 29, 2014 (Dkt. #5).

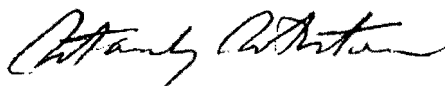
Since our motion for immediate discovery was granted, we have served subpoenas duces tecum on five telephone and internet companies, all of which have resulted in the production of documents. While the documents have revealed potential defendants, no evidence obtained to date definitively establishes responsibility for the hacking of DPA's website. As a result, we are not yet in a position to substitute named defendants for "John Doe," and do not anticipate that we will be able to substitute named defendants by the June 27 conference date.

Sept. 5, 2014
The conf. is adjourned
to Oct. 27, 2014, 10:00 a.m.
There will be no further
adjournments.
4-30-14
Alvin K. Hellerstein

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Accordingly, we respectfully request a 60-day adjournment of the conference, to August 26 or later, so that we may complete the discovery required to obtain sufficient evidence to identify the "John Doe" defendant(s), including, if necessary, depositions of the potential defendants identified to date.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stanley J. Silverstone". The signature is fluid and cursive, with the first name "Stanley" and last name "Silverstone" clearly distinguishable.

Stanley J. Silverstone